

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
SHELBY DIVISION

IN RE:)
DAVID WILLIAM ODOM and) Chapter 13
HEIDI PARTON ODOM)
Debtors) Case No: 10-40788

)

APPLICATION FOR ADDITIONAL BASE LEGAL FEES

NOW COMES the Debtors, David William Odom and Heidi Parton Odom, by and through counsel, Robert H. Lutz, and moves the Court for approval of a base legal fee of \$4,000.00 and in support thereof shows the Court as follows:

1. This Debtors filed their Chapter 13 Petition on September 27, 2010 in the Western District of North Carolina, Shelby Division.
2. The filing of this proceeding, in conjunction with subsequent and anticipated matters related to this filing, have and will result in expending numerous hours over and above the typical amount required to complete services normally contemplated in a Chapter 13 filing due to the nature of this case. For these reasons the attorney for the Debtors is moving the Court for approval of a base fee in the sum of \$4,000.00.

WHEREFORE, the attorney prays the Court as follows:

1. The Court approve a base fee of \$4,000.00; and
2. For such other and further relief as the Court may deem just and proper.

This the 8th day of November, 2010.

LUTZ LAW FIRM, PLLC

By: /s Robert H. Lutz
Robert H. Lutz
Attorney for the Defendant
310-8 East Graham Street
Shelby, NC 28150
Phone No: 704-600-6003
Fax No: 704-600-6004
State Bar No: NC 16375

CERTIFICATE OF SERVICE

This is to certify that I have this date served the following in the above named matter with a copy of the foregoing by placing a copy of same in the United States mail, postage paid, addressed to:

Steven G. Tate (served electronically)
Chapter 13 Trustee
PO Box 1778
Statesville, NC 28687-1778

Linda W. Simpson (served electronically)
Bankruptcy Administrator
402 W. Trade Street, Room 200
Charlotte, NC 28202

This the 8th day of November, 2010.

LUTZ LAW FIRM, PLLC

By: /s Robert H. Lutz
Robert H. Lutz
Attorney for the Defendant
310-8 East Graham Street
Shelby, NC 28051
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